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DEC 28 2016
U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
_____ DIVISION

Pearlie Mae Thomas)
NAME OF THE PLAINTIFF)

- vs -)

Fiserv Solutions)

Case No.)

JURY TRIAL DEMANDED)

YES ___ NO ___)

NAME OF THE DEFENDANT OR)
DEFENDANTS (Enter above the full name(s) of)
ALL defendant(s) in this lawsuit. Please)
attach additional sheets if necessary.)

EMPLOYMENT DISCRIMINATION COMPLAINT

1. This employment discrimination lawsuit is based on (check only those that apply):

_____ Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §§ 2000e, *et seq.*, for employment discrimination on the basis of race, color, religion, gender, or national origin.
NOTE: *In order to bring suit in federal district court under Title VII, you must first obtain a right-to-sue letter from the Equal Employment Opportunity Commission.*

☒ Age Discrimination in Employment Act of 1967, as amended, 29 U.S.C. §§ 621, *et seq.*, for employment discrimination on the basis of age (age 40 or older).
NOTE: *In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file charges with the Equal Employment Opportunity Commission.*

_____ American with Disabilities Act of 1990, as amended, 42 U.S.C. §§ 12101, *et seq.*, for employment discrimination on the basis of disability.
NOTE: *In order to bring suit in federal district court under the American with Disabilities Act, you must first obtain a right-to-sue letter from the Equal Employment Opportunity Commission.*

Rehabilitation Act of 1973, as amended, 29 U.S.C. §§ 701, et seq., for employment discrimination on the basis of a disability by an employer which constitutes a program or activity receiving federal financial assistance.

NOTE: *In order to bring suit in federal district court under the Rehabilitation Act of 1973, you must first file charges with the appropriate Equal Employment Office representative or agency.*

✓ Other (Describe)

Retaliation: Mrs. hexy Turner
went to the E.E.O.C and I was a
witness and she used my name as one of her witness.

PARTIES

2. Plaintiff's name: Pearlie Mae Thomas

Plaintiff's address: 6541 Sagamore Hills Ct.
Street address or P.O. Box

Florissant, Mo. 63033
City/ County/ State/Zip Code

(314) 495-5007
Area code and telephone number

3. Defendant's name: Fiserv Solutions

Defendant's address: 5875 N. Lindberg
Street address or P.O. Box

Hazelwood, Mo. 63042
City/County/State/ Zip Code

Area code and telephone number

NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES, ADDRESSES AND TELEPHONE NUMBERS ON A SEPARATE SHEET OF PAPER.

4. If you are claiming that the discriminatory conduct occurred at a different location, please provide the following information:

(Street Address) (City/County) (State) (Zip Code)

5. When did the discrimination occur? Please give the date or time period:

07-01-2014 10-27-2014

ADMINISTRATIVE PROCEDURES

6. Did you file a charge of discrimination against the defendant(s) with the Missouri Commission on Human Rights?

☒ Yes Date filed: April 24, 2015

☐ No

7. Did you file a charge of discrimination against the defendant(s) with the Equal Employment Opportunity Commission or other federal agency?

☒ Yes Date filed: April 24, 2015

☐ No

8. Have you received a Notice of Right-to-Sue Letter?

☒ Yes

☐ No

If yes, please attach a copy of the letter to this complaint.

9. If you are claiming age discrimination, check one of the following:

☒ 60 days or more have passed since I filed my charge of age discrimination with the

Equal Employment Opportunity Commission.

☐ fewer than 60 days have passed since I filed my charge of age discrimination with the

Equal Employment Opportunity Commission.

NATURE OF THE CASE

10. The conduct complained of in this lawsuit involves (check only those that apply):

☐ failure to hire me

☒ termination of my employment

☐ failure to promote me

☐ failure to accommodate my disability

☐ terms and conditions of my employment differ from those of similar employees

☒ retaliation

☒ harassment

☐ other conduct (specify): _____

Did you complain about this same conduct in your charge of discrimination?

☒ Yes

☐ No

11. I believe that I was discriminated against because of my (check all that apply):

___ race

___ religion

___ national origin

___ color

___ gender

___ disability

___ age (my birth date is: 07/14/1956)

___ other: _____

Did you state the same reason(s) in your charge of discrimination?

☒ Yes

☐ No

12. State here, as briefly and clearly as possible, the essential facts of your claim. Describe specifically the conduct that you believe is discriminatory and describe how each defendant is involved in the conduct. Take time to organize your statement; you may use numbered paragraphs if you find it helpful. It is not necessary to make legal arguments, or to cite cases or statutes.

I was cursed out by Sheronda Williams had to
sit next to her while she talk dirty. whenever
I walked pass her and no one was around
she would call me a skinny scarecrow.
While I was working with Johnathan Young Sharonda
would come in my area and curse me out, harass
me and try to brush up against me and I would

quickly move out of her way. Sheronda Williams came to my work station 7 times in one day and I reported her nothing was ever done.

I reported Carmen and Sam cursing me out to Mrs. Karen Plant manager and nothing was done.

When my work came up wrong 3 times in ^(cards were missing) one week my supervisor came to me "John May" and I explained to him that Samantha was over in the mail at lunch. John May said, he would go and let the office know that Samantha Wilkes was rumbling in the mail at lunch. The next day John May told me that they told him to stay out of it. All mail is open after I Q.A. it anyone can go in that mail as I saw Samantha do at lunch.

(Attach additional sheets as necessary).

13. The acts set forth in paragraph 12 of this complaint:

_____ are still being committed by the defendant.

☒ are no longer being committed by the defendant.

_____ may still be being committed by the defendant.

REQUEST FOR RELIEF

State briefly and exactly what you want the Court to do for you. Make no legal arguments;
cite no cases or statutes.

The wages that I loss and the stress
I went through to borrow money
to pay some of my bills.

Signed this 28 day of December, 2016.

Pearlie Mae Thomas
Signature of Plaintiff